

## EXHIBIT C

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1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF SOUTH CAROLINA  
3 CHARLESTON DIVISION  
4 IN RE: AQUEOUS )  
FILM-FORMING FOAMS )  
5 (AFFF) PRODUCTS ) MDL NO.  
LIABILITY LITIGATION ) 2:18-mn-2873-RMG  
6 \_\_\_\_\_ )  
THIS DOCUMENT RELATES )  
7 TO ALL CASES )

8 TUESDAY, NOVEMBER 10, 2020  
9 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY  
10 PURSUANT TO PROTECTIVE ORDER

11 - - -

12 Remote videotaped deposition of  
13 Dynax 30(b)(6) designee Eduard Kleiner,  
14 Ph.D., Volume II, held remotely at the  
15 location of the witness in commencing at  
16 9:02 a.m. Eastern Time, on the above date,  
17 before Carrie A. Campbell, Registered  
18 Diplomate Reporter and Certified Realtime  
19 Reporter.

20 - - -

21  
22  
23 GOLKOW LITIGATION SERVICES  
24 877.370.3377 ph | 917.591.5672 fax  
25 deps@golkow.com

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1           certain cases, but I not know them  
2           all. And this goes way back in time.  
3           And so going back in time and telling  
4           what's in the product, I can't do.

5                   (Kleiner Exhibit BB473 marked  
6           for identification.)

7   QUESTIONS BY MR. SUMMY:

8           Q.       Let's take a look at BB473.

9                   MS. RIES: What's that Bates,  
10          Scott?

11                  MR. SUMMY: This doesn't have a  
12          Bates number.

13   QUESTIONS BY MR. SUMMY:

14          Q.       Dr. Kleiner, you testified  
15          earlier that DX2200 had to be stopped from  
16          being sold under the EPA stewardship program,  
17          correct?

18          A.       Correct.

19          Q.       And why do you think that is?

20                  MS. RIES: Objection.

21                  THE WITNESS: It was  
22          100 percent C8-based.

23   QUESTIONS BY MR. SUMMY:

24          Q.       And isn't the reason that the  
25          EPA adopted the stewardship program and